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Vice President  
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SEP 20 1993

September 20, 1993

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Mr. William F. Caton, Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington, D.C. 20036

RE: In the Matter of 800 Data Base Access Tariffs and 800 Service Management System  
Tariff, DA 93-930, CC Docket No. 93-129

Dear Mr. Caton:

Attached is the original and four copies of the Direct Case of the Central Telephone Companies in the matter referenced above.

Sincerely,

A handwritten signature in cursive script that reads "Jay C. Keithley".

Jay C. Keithley  
Vice President  
Law and External Affairs

Attachment

JCK/mlm

**RECEIVED****SEP 20 1993**

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C.

**FEDERAL COMMUNICATIONS COMMISSION**  
**OFFICE OF THE SECRETARY**

In the Matter of	)	DA 93-930
	)	
800 Data Base Access Tariffs and	)	CC Docket No. 93-129
	)	
800 Service Management System Tariff	)	

**DIRECT CASE OF THE CENTRAL TELEPHONE COMPANIES**

Respectfully submitted,

**CENTRAL TELEPHONE COMPANIES**

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**ITS ATTORNEYS**

September 20, 1993

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## TABLE OF CONTENTS

	<u>Page</u>
I. BACKGROUND . . . . .	1
II. RESPONSES TO GENERAL ISSUES RAISED BY THE ORDER	2
A. Terms and Conditions of the 800 Data Base Tariffs . . . . .	2
B. Restructuring the Traffic-Sensitive Price Cap Basket . . . . .	4
C. Central is recovering only its direct incremental costs . . . . .	5
D. Central's demand assumptions have proven to be reasonable . . . . .	7
E. Role of Rate of Return LECs. . . . .	8
III. RESPONSES TO APPENDIX A OF THE ORDER . . . . .	10
A. Unit Cost and Investment Information . . . . .	10
B. Jurisdictional Separations . . . . .	10
C. Demand . . . . .	10
D. Other. . . . .	10
IV. RESPONSES TO APPENDIX B OF THE ORDER . . . . .	12
A. Central Cost and Demand Information. . . . .	12
B. Jurisdictional Separations . . . . .	12
C. Demand . . . . .	12
D. Other. . . . .	12

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C.**

In the Matter of	)	DA 93-930
	)	
800 Data Base Access Tariffs and	)	CC Docket No. 93-129
	)	
800 Service Management System Tariff	)	

**DIRECT CASE OF THE CENTRAL TELEPHONE COMPANIES**

The Central Telephone companies (Central) hereby submit their Direct Case in response to the Common Carrier Bureau's Order Designating Issues for Investigation (Order) released July 19, 1993, in the matter described above. Central's Direct Case consists of four parts -- (1) background; (2) responses to the general issues raised in the body of the Order; (3) responses to the appropriate questions contained in Appendix A and Appendix B of the Order; and (4) appropriate data requested by Appendix A and Appendix B of the Order.

**I. BACKGROUND**

On March 5, 1993, Central filed Transmittal No. 219, Tariff F.C.C. No. 1, to amend the rates and regulations associated with the provision of 800 access service. The offering, which was

filed pursuant to Commission order,<sup>1</sup> became effective May, 1, 1993, and replaced the NXX method of 800 access with 800 data base access.

## **II. RESPONSES TO GENERAL ISSUES RAISED BY THE ORDER**

### **A. Terms and Conditions of the 800 Data Base Tariffs**

In the Order, the Bureau invited interested parties to comment on whether certain terms and conditions in the 800 data base tariffs were reasonable. The Order described the general issue as "[t]he degree of clarity with which the LEC 800 data base tariffs describe the services offered."<sup>2</sup> The Order then cited specific concerns of parties who filed petitions concerning the LEC tariffs. The specific concerns and Central's responses are as follows:

1. Does the Central tariff state clearly that 800 query service includes area of service routing at the LATA level?

**CENTRAL RESPONSE:** Central's tariff clearly explains that 800 query service includes area of service routing at the LATA level. At Page 63.3 the tariff states, "800 calls may be routed to different customers based on the local access transport area in which the call originates."

---

1. Report and Order, 4 FCC Rcd 2824 (1989); Memorandum Opinion and Order on Reconsideration and Second Supplemental Notice of Proposed Rulemaking, 6 FCC Rcd 5421 (1991); Order, 7 FCC Rcd 5197 (1992) (Sprint Petition Order); Order, 7 FCC Rcd 8616 (1992) (Ad Hoc Petition Order); Second Report and Order, CC Docket No. 86-10, 8 FCC Rcd 907 (1993) (Rate Structure Order); Memorandum Opinion and Order on Further Reconsideration, 8 FCC 1038 (1993); Order, 8 FCC Rcd 1423 (1993) (Comptel Petition Order); Order 8 FCC Rcd 1844 (1993) (Second Sprint Petition Order).

2. Order at 3.

2. Does the Central tariff clearly describe when Central may charge for a query when the associated call is not delivered to the IXC? Should the tariff provisions in this regard be uniform among LECs?

**CENTRAL RESPONSE:** The Central tariff clearly describes when the charge for an 800 data base query is to be assessed. The Central tariff at Page 136.1 states, "An 800 Data Base Query charge will apply for each 800 call query received at the Telephone Company's 800 data base." Simply put, the 800 carrier will be billed for a query if the Central data base responds to the query by returning a valid carrier identification code for routing an 800 call. If required, Central could develop a per-call-delivered rate that would also reflect the costs of undelivered calls.

Regarding tariff uniformity, Central can make cost recovery decisions only for itself.

3. Does the Central tariff contain ambiguities that would allow the companies to market vertical features directly to end users?

**CENTRAL RESPONSE:** If required by the Commission, the Central tariff will be amended to more explicitly state that optional [vertical] features are not available to customers of interexchange carriers for use in connection with interLATA 800 services.

4. Does the Central tariff require customers to take RESPORG service in order to obtain vertical features?

**CENTRAL RESPONSE:** No. The Central tariff clearly explains that vertical feature information can be loaded into the 800 SMS either by the 800 Access Service customer or through the 800 Access Service customer's RESPORG. The Central tariff at Page

63.3 states, "The customer must enter the desired format and the necessary ten digit local exchange telephone number, if any, into the 800 SMS or provide such information to its Responsible Organization for handling."

5. The SMS/800 tariff allows a RESPORG to reserve a maximum of 3,000 numbers or 15% of its total quantity of working 800 numbers, whichever is greater. Are these limits reasonable? What, if any, should the reservation policy be?

**CENTRAL RESPONSE:** Central will continue to work with the industry to develop numbering standards that are fair to all parties.

6. Should the LECs include RESPORG services in their 800 data base tariffs?

**CENTRAL RESPONSE:** Central does not now tariff RESPORG services but will do so if the Commission determines that tariffing is appropriate.

**B. Restructuring the Traffic-Sensitive Price Cap Basket**

The Bureau's Order also invited interested parties to comment on the reasonableness of the methods used by the price cap LECs to restructure their traffic-sensitive baskets, while also adjusting for exogenous costs. The Central Telephone companies became price cap carriers on July 1, 1993. Their 800 data base access rates were effective prior to that date and were introduced under rate of return regulation. Central used its May 1, 1993, 800 data base access service demand and rates to initialize price cap indices. As a result, Central did not restructure its Traffic Sensitive Basket to accomplish the

introduction of 800 data base services, and an exogenous cost change was not required.

**C. Central is recovering only its direct incremental costs**

The text of the Order poses general questions about the costs and demand used to develop the 800 data base access rates. Some of these questions are repeated in Appendix A and Appendix B of the Order. Central cross references its responses where appropriate.

Central does not own an SCP. Central has contracted with Sprint/United to perform the query function for 800 calls originated by Central customers. In addition, Central has contracted with Independent Telecommunication Network, Inc. (ITN) to provide the signalling links between Central's local STPs and ITN's STPs at its switching hubs. From ITN's hubs, Central's 800 queries are switched and transported to Sprint/United's SCPs. Query responses are returned to Central's switching modes over the ITN network.

In short, Central's 800 data base query charges reflect the direct incremental cost to Central from the vendors described above. The three basic costs are:

1. The amount charged by Sprint/United to process each 800 data base query.
2. The amount charged by ITN to transport 800 data base queries between Central's access tandems and ITN's hubs. The charge to Central is on a per query basis.
3. The amount charged by ITN to switch and transport 800 data base queries to and from the Sprint/United SCP. The charge to Central is per query.



The sum of these three elements is currently \$.01243 per query.

In developing its 800 data base access rates, Central estimated that 20 per cent of the SCP responses to its data base queries would not include an appropriate carrier access code. In such cases, Central would be required to pay the query charges assessed by its vendors for transporting and processing the queries, but would not be able to recover these costs from an interexchange carrier. Based on these assumptions, Central increased its direct incremental costs per query by 20% to ensure full cost recovery.

Central's assumptions in this regard have not proven to be valid. Based on actual experience, Central now estimates that about 2% of its 800 data base queries will be unbillable. Central proposes to reduce its 800 data base query rate for the data base look up by an appropriate amount when the Bureau issues a final order in this investigation.

Central's rate for its two 800 data base optional features -- (1) 800 to Local Exchange Number Translation and (2) Customized 800 Call Routing -- reflects the direct incremental cost of the features. That is, the rate is based on the contract price Sprint/United assesses per optional feature query. The rate also recovers Central's incremental costs of billing system enhancements. These costs were levelized over five years, as was optional feature demand forecasts. Base year optional feature

demand was estimated to be 3% of the demand for basic 800 data base queries, even though little interest in the optional features was expressed by the larger interexchange carriers. To date, Central has realized minimal demand for the optional features.

**D. Central's demand assumptions have proven to be reasonable**

Relying on historical trends, Central forecasted its base year demand to be 251,800,000 data base queries. In reviewing the forecast for this direct case, Central discovered that the demand estimate for its Virginia study area was not included in the forecast used to establish initial rates. The forecast should have been 299,700,000 queries.

Central has annualized four months of actual 1993 demand, and estimates that its first year query volume will be 271,680,000. Central believes its forecast, when compared to actual demand, is within reason. In fact, demand has no impact on rates because the rates are a simple pass-through of costs.

Central did not increase its first year of 800 data base access demand by an amount that would reflect demand stimulation created by the introduction of a new service. Central believes that such stimulation will be offset by the migration of customers of data base validation services to local area and packet networks for validator-type services that are currently using 800 numbers.

**E. Role of Rate of Return LECs**

7. Can the originating LEC properly establish tarified charges for the query service when the neighboring LEC who provides the service also has charges for the service in its tariff?

**CENTRAL RESPONSE:** While the Central companies have elected price caps regulation, the issue of end office responsibility is of vital importance to them. Not all Central tandems have been provisioned with SSP functionality. Where such functionality has not been deployed, Central must route originating 800 calls to the tandem of a neighboring carrier whose switch has SSP functionality. The neighboring carrier then launches a query to its 800 data base and routes the call from its tandem to the appropriate interexchange carrier for completion. In these instances, where Central chooses to bill the interexchange carrier directly, the neighboring carrier should provide the query record to United for billing at the 800 query rates contained in Central's interstate access tariff. Regardless of which carrier ultimately performs the 800 query and routing, the fact remains that final responsibility for the call resides with the carrier from whose central office the call originates (although in jointly provisioned services of this nature, issue resolution often requires both parties).

In the scenario described above, the carrier from whose central office the call originates simply purchases the query and routing functions from the neighboring carrier at the neighboring carrier's tarified query rate. These per query costs then become

components of the query rate charged by the originating carrier. The originating carrier can pass through the neighboring carrier's rate adjusted for additional administrative costs the originating carrier might incur. The originating carrier could also use the relevant tariffed query rate and related query demand of the neighboring carrier to develop a blended rate which it would then reflect in its own tariff.

In developing its 800 query rates, Central did not know what rates would be filed by neighboring carrier whose tandems would provide SSP functionality for some Central offices. Central assumed the neighboring carriers' rates would be similar to Central rates. Based on this assumption, Central filed a single query rate for study areas that included exchanges subtending a neighboring carrier's SSP-equipped tandem. The Central rate was based on its own costs and demand, excluding the demand associated with subtending exchanges. When rates are finalized in this proceeding, Central will determine if its query rate is substantially different from the rate being charged by carrier's whose SSP offices Central subtends. If the rates are significantly difference, Central will amend its current 800 data base access tariff to identify exchanges subtending other carrier's SSP-equipped tandems. The 800 data base query rates for calls originating from these subtending offices will, at that point, reflect the charges assessed to Central by the neighboring carrier.

This is consistent with Central's overall rate development methodology, which is to reflect only the incremental costs Central incurs to provide the service.

8. Should rate changes by the SCP owner be flowed through to the rates of the subtending (originating) LEC?

**CENTRAL RESPONSE:** The subtending carrier should have an opportunity to justify any rate it proposes.

### **III. RESPONSES TO APPENDIX A OF THE ORDER**

#### **A. Unit Cost and Investment Information**

**CENTRAL RESPONSE:** See Section II, C, above.

#### **B. Jurisdictional Separations**

**CENTRAL RESPONSE:** See Section II, C, above.

#### **C. Demand**

**CENTRAL RESPONSE:** See Section II, C, above.

#### **D. Other**

1. If a discount rate is used in your demand calculations, explain the rationale for use of this rate.

**CENTRAL RESPONSE:** See Section II, C, above.

2. If you based your demand growth assumptions completely on past performance, explain why the introduction of 800 data base service will have no effect on the growth rate for 800 query demand for your company.

**CENTRAL RESPONSE:** See Section II, C, above.

3. Explain how the demand assumptions were used in your ratemaking methodology.

**CENTRAL RESPONSE:** See Section II, C, above.

4. Provide the annual costs for all expenses related to the SMS/800 incurred pursuant to contracts with Bellcore, Data Services Management, Inc, or any other entity. Provide the terms of the contract and an explanation of how the annualized amount is calculated.

**CENTRAL RESPONSE:** See Section II, C, above.

5. Provide cost detail, by account, associated with upgrading the SSPs for 800 data base service and justify why those upgrades should be treated as exogenous costs.

**CENTRAL RESPONSE:** The Order only requires that Central spreadsheets be populated with demand data.

6. If overhead costs were included as exogenous costs in your initial filing, justify why those costs should be treated as exogenous costs.

**CENTRAL RESPONSE:** See Section II, C, above.

7. If signaling link costs between local STPs and regional STPs are included as exogenous costs, justify why those costs should be treated as exogenous costs.

**CENTRAL RESPONSE:** See Section II, C, above.

8. If costs for regional or local STPs are included as exogenous costs, justify why those costs should be treated as exogenous costs.

**CENTRAL RESPONSE:** See Section II, C, above.

9. For each of your company's SCPs, list and describe each service that is supported by that SCP (i.e., 800 data base, LIDB, virtual private networks, wide area Centrex or unrelated administrative functions). Provide a diagram of the equipment in an SCP installation typical for your company.

**CENTRAL RESPONSE:** See Section II, C, above.

10. If costs for the SCP are allocated among the functions described above, explain your allocation procedures and provide your allocation factors and how these factors were derived.

**CENTRAL RESPONSE:** See Section II, C, above.

#### **IV. RESPONSES TO APPENDIX B OF THE ORDER**

##### **A. Central Cost and Demand Information**

**CENTRAL RESPONSE:** See the attached spreadsheets.

##### **B. Jurisdictional Separations**

**CENTRAL RESPONSE:** See the attached spreadsheets.

##### **C. Demand**

1. For 800 data base service, provide the demand level used in your cost calculations.

**CENTRAL RESPONSE:** See Section II, C, above.

2. If in calculating your costs, you lowered your demand estimate to compensate for unbillable queries, thereby increasing costs, provide the percent by which you lowered demand.

**CENTRAL RESPONSE:** See Section II, C, above.

##### **D. Other**

3. Explain and justify your rationale for the factor used to decrease demand for your ratemaking calculations.

**CENTRAL RESPONSE:** See Section II, C, above.

4. Provide the name of the SCP providers for your query service.

**CENTRAL RESPONSE:** Sprint/United Management Company.

5. Provide the query rate on which your rates were based.

**CENTRAL RESPONSE:** See Section II, C, above.

6. Did your SCP provider(s) revise rates since your original rate calculations.

**CENTRAL RESPONSE:** Yes.

7. If your SCP provider(s) revised rates, have you revised your rates to reflect the change in your costs?

**CENTRAL RESPONSE:** Yes. Central's annual access tariff filing, effective July 1, 1993, adjusted 800 basic query rates to reflect a reduction in charges from its SCP provider.

8. If you use two or more SCP providers and develop a composite query cost, explain how the composite is calculated for inclusion in your rates.

**CENTRAL RESPONSE:** Central contracts for SCP services only with Sprint/United Management Company.

9. If you use a transport provider, provide the name and per query rate assessed by that provider.

**CENTRAL RESPONSE:** Central contracts with Independent Telecommunications, Inc. for transport of 800 data base queries. Details of the contract are proprietary. Central's total direct costs per query are explained in Section II, C, above.

10. Provide worksheets showing all relevant data and calculation.

**CENTRAL RESPONSE:** Relevant data and calculations are detailed in responses to the various questions posed by the Order.

11. Include and justify any other costs incurred to provide 800 service.

**CENTRAL RESPONSE:** Other than billing system enhancements to provide optional 800 data base services (discussed in Section II, C, above), Central's 800 data base query rates reflect only the



incremental costs associated with transport and SCP services provided by third-party vendors.

Respectfully submitted,

CENTRAL TELEPHONE COMPANIES

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ITS ATTORNEYS

September 20, 1993

# INFORMATION REQUEST FOR 800 DATABASE SERVICE EXOGENOUS COSTS

Central Companies

I. Unit Cost and Investment

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P
	Land Acct 2111	Buildings Acct 2121	General Purpose Computers Acct 2124	Analog Switching Acct 2211	Digital Switching Acct 2212	Radio System Acct 2231	Circuit Equipment Acct 2232	Other Terminal Equipment Acct 2262	Poles Acct 2411	Aerial Cable Acct 2421	Underground Cable Acct 2422	Buried Cable Acct 2423	IntraBldg Network Cable Acct 2425	Aerial Wire Acct 2431	Conduit Systems Acct 2441	Total
STP/SCP Signalling Link																
Unit Investment																None
Unit Costs																
Depreciation																None
Net Return																None
Federal Income Tax																None
State & Local Income Tax																None
Maintenance																None
Administration																None
Other Tax																None
Other Direct Expense																None
Overhead Loadings																None
Total																None
Local STP/Regional STP Signalling Link																
Unit Investment																None
Unit Costs																
Depreciation																None
Net Return																None
Federal Income Tax																None
State & Local Income Tax																None
Maintenance																None
Administration																None
Other Tax																None
Other Direct Expense																None
Overhead Loadings																None
Total																None
Tandem Switch																
Unit Investment																None
Unit Costs																
Depreciation																None
Net Return																None
Federal Income Tax																None
State & Local Income Tax																None
Maintenance																None
Administration																None
Other Tax																None
Other Direct Expense																None
Overhead Loadings																None
Total																None
SSP																
Unit Investment																None
Unit Costs																
Depreciation																None
Net Return																None
Federal Income Tax																None
State & Local Income Tax																None
Maintenance																None
Administration																None
Other Tax																None
Other Direct Expense																None
Overhead Loadings																None
Total																None

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P
II. Jurisdictional Separations	Land Acct 2111	Buildings Acct 2121	General Purpose Computers Acct 2124	Analog Switching Acct 2211	Digital Switching Acct 2212	Radio System Acct 2231	Circuit Equipment Acct 2232	Other Terminal Equipment Acct 2362	Poles Acct 2411	Aerial Cable Acct 2421	Underground Cable Acct 2422	Buried Cable Acct 2423	IntraBldg Network Cable Acct 2426	Aerial Wire Acct 2431	Conduit Systems Acct 2441	Total

#### STP/SCP Signalling Link

Total Investment *																None
Total Company *																None
Subject to Separation *																None
State 800 Database **																None
State Other **																None
Interstate 800 Database **																None
Interstate Other **																None

#### Method of Assignment

#### Local STP/Regional STP Signalling Link

Total Investment																None
Total Company																None
Subject to Separation																None
State 800 Database																None
State Other																None
Interstate 800 Database																None
Interstate Other																None

#### Method of Assignment

#### Tandem Switch

Total Investment																None
Total Company																None
Subject to Separation																None
State 800 Database																None
State Other																None
Interstate 800 Database																None
Interstate Other																None

#### Method of Assignment

Total Investment																None
Total Company																None
Subject to Separation																None
State 800 Database																None
State Other																None
Interstate 800 Database																None
Interstate Other																None

#### Method of Assignment

Central Companies	A
III. Demand	Total

#### 800 Database Queries

State 800 Database	
State Other	
Interstate 800 Database*	2500000000
Interstate Other	
Unbillable Query Factor	20.00%

\* This number represents all 1993 800 queries (state and interstate) for the Central Companies.

## **CERTIFICATE OF SERVICE**

I, Melinda L. Mills, hereby certify that I have on this 20th day of September, 1993, sent via U.S. First Class Mail, postage prepaid, or Hand Delivery, a copy of the foregoing "Direct Case of the Central Telephone Companies" in the Matter of 800 Data Base Access Tariffs and 800 Service Management System Tariff, DA 93-930, CC Docket No. 93-129, filed this date with the Acting Secretary, Federal Communications Commission, to the persons listed on the attached service list.

  
Melinda L. Mills

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\* indicates Hand Delivery